May 25, 2006

#### **VIA ECFS**

Marlene H. Dortch, Secretary Federal Communications Commission The Portals 445 12th Street, S.W. Washington, D.C. 20554

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**Re:** Notification of *Ex Parte* Meetings of Neutral Tandem, Inc.

WC Docket No. 06-55

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("Commission") Rules, 47 C.R.F. § 1.1206, this letter serves to provide notice in the above-captioned proceeding of several *ex parte* meetings on May 24, 2006. The undersigned accompanied Rian Wren and Ronald Gavillet of Neutral Tandem, Inc. ("Neutral Tandem") in separate meetings with Jessica Rosenworcel, Senior Legal Advisor for Commissioner Copps; Michelle Carey, Senior Legal Advisor for Chairman Martin; and Scott Bergmann, Legal Advisor for Commissioner Adelstein.

The purpose of these meetings was to update the Commission on Neutral Tandem's views on the Petition for Declaratory Ruling filed by Time Warner Cable, which were consistent with the company's comments and reply comments filed in the above-captioned docket. Neutral Tandem also provided Commission staff with a presentation addressing these issues, attached hereto, and discussed the same.

Pursuant to the Commission's Rules, this letter is being filed in the above-captioned proceedings for inclusion in the public record. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Russell M. Blau Jeffrey R. Strenkowski

Counsel for Neutral Tandem, Inc.

### Enclosure

cc: Rian Wren (Neutral Tandem)
Ronald Gavillet (Neutral Tandem)
Michelle Carey (FCC)
Jessica Rosenworcel (FCC)
(cont'd)

Marlene H. Dortch May 25, 2006 Page 2

> Scott Bergmann (FCC) Jeremy Miller (FCC) Renee Crittendon (FCC) Jennifer Schneider (FCC)









# Time Warner Cable Petition for Declaratory Ruling WC Docket No. 06-55





## **Time Warner Cable Petition**

- Neutral Tandem and other carriers' carriers must be allowed to resell interconnection services, including transit, without discrimination
- Carriers' carrier interconnection with ILEC (allows resale of transit and 251 local traffic terminations)
  - Promotes intermodal competition
  - ➤ More robust Homeland Security
  - Interconnection includes other carriers' subtending switches
    - ➤ ILECs refuse to recognize designation of competitive tandem switch as a homing tandem in LERG
  - Interconnection with terminating carrier (allows direct connection)
    - AT&T: Transit provider has right to interconnect to terminate traffic not originated by its "end user"





## **Non-Discriminatory Tandem Interconnection Promotes Redundancy**

**ILEC End Offices** 



























